REMARKS/ARGUMENTS

Prior to this amendment, claims 1, 3-18, 20-23 and 25-42 were pending. In this amendment, claims 1, 6-9, 18, 23, 26, and 28-31 are amended, claims 3, 5, 20, 21, 25, and 27 are canceled, and no claims are added. No new matter is added. Thus, after entry of this amendment, claims 1, 4, 6-18, 22, 23, 26, and 28-42 are pending.

I.   Objections to the Specification

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. Claims 1, 18, and 23 have been amended to remove the objected to language. As such, the objection to the specification is obviated. Withdrawal of the objection to the specification is respectfully requested.

II.   Claim Rejections – 35 USC § 112, First Paragraph

Claims 1, 3-18, 20-23, and 25-42 are rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Claims 1, 18, and 23 have been amended to remove the objected to language. As such, the rejection under 35 U.S.C. §112, first paragraph is obviated. Withdrawal of the rejection is respectfully requested.

III.   Claim Rejections – 35 USC § 112, Second Paragraph

Claims 1, 3-18, 20-23, and 25-42 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claims 1, 18, and 23 have been amended to remove the objected to language. As such, the rejection under 35 U.S.C. §112, second paragraph is obviated. Withdrawal of the rejection is respectfully requested.

IV.   Claim Rejections – 35 USC § 103(a), David, Wason

Claims 1, 3-18, 20-23, and 25-42 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Davis* (U.S. Publication No. 2003/0041077) in view of *Wasan* (U.S.

Publication No. 2004/0210838). This rejection is traversed. Each and every limitation of the claims is not taught or suggested by the cited references, alone or in combination.

Claim 1

Claim 1 has been amended to contain limitations previously present in dependent claims 3 and 5. At the outset, it should be noted that applicants' are not attempting to claim mapping of data generally. Applicants' claims are directed to a specific method of mapping internal metadata to external metadata. Furthermore, applicants' claims are directed to a user interface that may be advantageously used by a user to provide easy and efficient access to the claimed mapping system.

A.   **Each and every limitation is not taught or suggested**

Each and every limitation of claim 1 is not taught or suggested by the cited references, alone or in combination. For example, claim 1 as amended recites in part:

> determining if the external metadata describing all data points within said selection is predefined, and if so, receiving from said user a definition of external metadata comprising:
>> presenting said user a list from which they may select an item of predefined
> metadata; and
>> receiving from said user a selection of an item of predefined metadata from said
> list; and

The above limitation was generally previously presented in dependent claim 3, which has now been incorporated into claim 1. Such a limitation is not taught or suggested by *Davis* or *Wasan*, alone or in combination. In the rejection of claim 3, the Office Action has not alleged the above limitation is taught or suggested in *Davis*. (Office Action, Pg. 17-18) This interpretation of *Davis* is correct. *Davis* describes a system wherein XBRL text documents may be parsed and translated into RDX documents or NDOMs. (*Davis,* P[0062]). The RDX documents and NDOMs may then, by means of an RDX mapper 210, be translated back into XBRL for reporting purposes. (*Davis,* FIG. 2, P[0065]). The RDX mapper 210 utilizes document templates 214 for mapping instructions. (*Davis* at P[0064]). These document templates 214 are created manually by a user "in a manner similar to a word processor." (*Davis* at P[0063]). Thus, while *Davis* teaches that data may be mapped from one format into another format, *Davis* teaches nothing like the method

of claim 1 for assisting a user in creating a mapping, wherein a user is presented with a user interface

that provides lists for selecting the external metadata to be mapped.

The addition of *Wasan*, even if there was motivation to do so, does not resolve this

discrepancy. *Wasan* describes a system for managing web content, e.g. documents. (*Wasan,*

P[0002]). A document is defined as a complex object, containing subobjects (fields). (*Wasan,*

P[0021]). The definition of what goes into the fields is defined in a second complex metadata object.

(Id.). In the rejection of dependent claim 3, the Office Action alleges:

> (At Page 2 paragraph [0031-0036]→ Wason disclosed this limitation, as clearly
>
> indicated in the cited text, [e.g., when necessary Externalize Definition of Keyword
>
> Selections is used for mapping between the selected internal metadata and the external
>
> metadata; these definitions are stored in the relational database and can be modified in
>
> the deployed application without a need to redeploy.] Also Wason further discloses
>
> External column names in EADP are set using the external names dictionary editor in
>
> the database definition class [Wason Para [0075]; Moreover, EADP site search provides
>
> a list of tables that can be searched as Document plus the template name and to map
>
> user input to the correct database columns using the same scheme for the list form for
>
> documents so that they do not have to be retrieved over and over again. This is
>
> generally set forth at page 4 paragraph(s) [0076-0079] of Wason.])

(Office Action, Pg. 18). However, in reviewing the rejection, as well as the reference as a whole,

applicants' are unable to determine where the limitation of "*determining if the external metadata*

describing all data points within said selection is predefined," is taught or suggested. Furthermore,

claim1 has been emended to further contain the limitations generally present in previously dependent

claim 5, which recites:

> determining if a syntax of the external metadata describing all data points within said
> selection is predefined and the external metadata for said selection is not predefined, and if so,
> receiving from said user a definition of external metadata comprising:
> > presenting said user with one or more dialog boxes in which they can specify
> external metadata to be created; and
> > receiving from said user a specification of external metadata to be created;

The Office Action has rejected the above limitation with the exact same paragraph as reproduced above. (Office Action, Pg. 20). Again, applicants' are unable to determine where the limitation of "*determining if a syntax of the external metadata describing all data points within said selection is predefined and the external metadata for said selection is not predefined,*" is taught or suggested.

Additionally, the Office Actions rejection is internally inconsistent. Claim 1, as amended, recites two separate user interfaces. If all external metadata is defined, a list is presented to the user for selection of external metadata. If all external data is not defined, but the syntax for the external metadata is defined, the user is presented with a dialog box to specify the external metadata to be created. The Office Action has not shown where separate user interfaces are presented, depending on if the external metadata is defined, or if only the syntax is defined. In repeating the language of the rejection, the Office Action has failed to show where *Wasan* presents different user interfaces depending on the external metadata. Furthermore, *Wasan* only describes one user interface. (*Wasan*, Fig. 6). *Wasan* does not describe a second, different user interface, based on the external metadata.

B.   No rational underpinning to support legal conclusion of obviousness

Obviousness has also not been established, since there is no reason to combine *Davis* and *Wasan* in the manner proposed by the Examiner. As explained in the PTO's own guidelines on *KSR International Co. v. Teleflex Inc.*: 82 USPQ2d 1385 (2007):

> *The key to supporting any rejection under 35 U.S.C. 103 is the*
> *clear articulation of the reason(s) why the claimed invention would*
> *have been obvious.* The Supreme Court in KSR noted that the
> analysis supporting a rejection under 35 U.S.C. 103 should be
> made explicit. The Court quoting In re Kahn[41] stated that
> "'[R]ejections on obviousness cannot be sustained by mere
> conclusory statements; instead, *there must be some articulated*
> *reasoning with some rational underpinning to support the legal*
> *conclusion of obviousness.*'"

Here, there is no rational underpinning to support the legal conclusion of obviousness. The Office Action alleges:

Appl. No. 10/692,525
Amdt. dated November 23, 2009
Response to Office Action dated June 23, 2009

PATENT

> One of ordinary skill in the art would have been motivated
>
> to modify this combination because Davis and Wason are both directed to a method
>
> and system of generating, displaying, analyzing and controlling XBRL report. This
>
> combination provides a predictable result of advantageously provides a finer level of
>
> detail that enables the user to enable reports to be automatically scheduled and
>
> transmitted in XBRL format, and capable of automatically link a current accounting
>
> system to an XBRL document to generate an XBRL report; that have an efficient and
>
> automatic means to analyze and manipulate data in an XBRL document utilizing
>
> internal/external metadata of XBRL- See Davis at Para 24.

(Office Action, Pg. 14-15, and substantially repeated throughout the Office Action). First, the Office Action alleges that *Wasan* is directed to XBRL documents. The entire *Wasan* reference has been reviewed, and no mention of XBRL has been found. As such, the Office Actions allegation that *Wasan* describes as system dealing with XBRL is incorrect.

Secondly, and more importantly, the Office Action has stated that *Davis* describes a system the enables XBRL reports to be automatically generated from a current accounting system, and provides an efficient means for manipulating XBRL. (*Davis,* P[0024]). However, the Office Action has merely made a conclusory statement that the addition of *Wasan* provides a finer level of detail. In fact, this is not possible. *Davis* already describes utilization of an XBRL taxonomy document. (*Davis,* Table 2). The XBRL taxonomy already defines the XBRL document in the finest level of detail possible. (*Davis,* P[0015]). As such, the addition of *Wasan* cannot provide a finer level of detail, as the XBRL taxonomy as described by *Davis* is already at the finest level of detail for an XBRL document.

Withdrawal of the rejection of claim 1, and the claims which depend therefrom is respectfully requested for reasons including those set forth above.

Claims 18 and 23

Claims 18 and 23 have been amended to contain limitations similar to those presented above with respect to claim 1. Claims 18 and 23, and the claims which depend therefrom, are allowable for at least some of the reasons set forth above with respect to claim 1. Withdrawal of the rejection of claims 18 and 23, and the claims which depend therefrom, is respectfully requested.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,

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